

**IN THE UNITED STATES DISTRICT COURT FOR THE
WESTERN DISTRICT OF MISSOURI
SOUTHERN DIVISION**

UNITED STATES OF AMERICA,)

Plaintiff,)

v.)

SCOTT GOODWIN-BEY,)

Defendant.)

Case No. 14-03104-CR-S-RK

**MOTION FOR EXTENSION OF TIME IN WHICH TO SUBMIT A RESPONSE
TO DEFENDANT'S MOTION TO SUPPRESS**

Comes now the United States of America, by and through its undersigned counsel, and moves the Court for a fourteen day enlargement of time to submit its response to defendant's Motion to Suppress for the following reasons:

1. Undersigned counsel, in the last several weeks, has handled multiple 2255 petitions, and is in the process of completing the Government's responses in *Pulliam v. United States*, case no. 15-2310, and *Johnson v. United States*, case no. 15-03514-CV-S-MDH-P.
2. Counsel has seven cases appearing on the upcoming February Joint Criminal Trial Docket. Counsel is in the process of attempting to resolve said cases.
3. Counsel was diagnosed with acute bronchitis on December 27, 2015. Said illness resulted in several days of absence from the office.

4. Counsel assures the Court that this requested enlargement of time is not sought to hinder or delay this matter, and will not result in prejudice to the defendant.

WHEREFORE, for all the foregoing reasons, the United States respectfully requests that an enlargement of time to and including Tuesday, January 19, 2016, be granted in which to submit a response to defendant's Motion.

Respectfully submitted,

Tammy Dickinson
United States Attorney

By: /s/James J. Kelleher
James J. Kelleher
Assistant United States Attorney
901 St. Louis, Suite 500
Springfield, Missouri 65806
(417) 575 - 8106

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a copy of the foregoing was delivered on January 4, 2016, to the CM-ECF system of the United States District Court for the Western District of Missouri for electronic delivery to all counsel of record.

/s/ James J. Kelleher

James J. Kelleher

Assistant United States Attorney